

November 13, 2019

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1106
New York, NY 10007

Re: Wisser v. Vox Media, Inc., 1:19-cv-01445 (LGS)

Dear Judge Schofield:

We represent Plaintiff Bill Wisser (“Plaintiff”) in the above-captioned case and write pursuant to section III.B.5 of Your Honor’s Individual Practice Rules. This letter intends to supersede the letter filed at Dkt. #57 to fix certain typographical errors.

Pursuant to the Court’s order, on November 12, 2019, Plaintiff re-filed amended opposition papers to Defendant’s Vox Media, Inc.’s motion for sanctions, which consists of an amended memorandum of law¹ [Dkt. #54], revised Declaration of Richard Liebowitz plus exhibits [Dkt. #55]; and Declaration of Bill Wisser² plus revised exhibits A, B and D (Exhibit C was intentionally omitted) [Dkt. #56]. The Declaration of James Freeman [Dkt. #48] was not amended and therefore not re-filed. The new submission complies with Section III.B.3 of Your Honor’s Individual Rules.

In light of Plaintiff’s re-filing of his amended opposition papers, Plaintiff respectfully requests leave of Court to deliver another courtesy copy of all parties’ motion papers, organized in a three-ring binder in the following order:

- 1) Defendant’s Notice of Motion, Memorandum of Law, Declaration of Rachel Strom plus exhibits.
- 2) Plaintiff’s Opposition Memorandum (as amended), Declaration of Bill Wisser plus exhibits (as amended), Declaration of Richard Liebowitz plus exhibits (as amended); Declaration of James Freeman.

¹ Please note that Plaintiff did not make any substantive changes to the original memorandum but only updated citations to the revised declaration of Richard Liebowitz.

² The Wisser Declaration is identical to that filed on October 24, 2019.

- 3) Defendant's Reply Memorandum of Law, Reply Declaration of Rachel Strom, plus exhibits.

Thank you for Your Honor's consideration.

Respectfully Submitted,

/s/richardliebowitz/
Richard Liebowitz

Counsel for Plaintiff Bill Wisser